

EXHIBIT A1

N. Tagai - direct - Mr. Balestriere

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1 Q So you just stated Jennifer Powers. That is the other
2 defendant here.

3 When you made your flight arrangements, did Mr.
4 Rubin or anyone else end up reimbursing you for those
5 flights?

6 A I would be reimbursed with the payment I would get from
7 Mr. Rubin.

8 Q Who would end up actually giving you the money?

9 A Jennifer Powers.

10 Q Prior to 2015 had you met Jennifer Powers?

11 A No, I had not. Just over WhatsApp we did messaging, but
12 never in person.

13 Q Just to be clear, WhatsApp, is that like a message or
14 text communication platform?

15 A Yes, it is.

16 Q Each time you met with Mr. Rubin, did he pay you?

17 A Yes, he did.

18 Q How did he pay you?

19 A In the beginning there were a few times where it was
20 cash and then it went from that to bank wires, to Jennifer
21 doing the PayPal transfers.

22 Q Now, when you came to New York to meet with Mr. Rubin,
23 did you understand that there might be some sex involved?

24 A Yes.

25 Q Did you understand that you would be paid for the time

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1 that you were here in New York?

2 A Yes, I was.

3 Q You talked about what you called the condo.

4 Can you describe that just broadly? What are you
5 talking about there?

6 A It's a condo downtown about a few minutes from Central
7 Park. I am not familiar with New York, too much of the area.
8 By Central Park. A very nice penthouse, two bedroom,
9 spacious, beautiful, upscale condominium.

10 Q When you talk about the condominium, is it always this
11 one apartment?

12 A Yes.

13 MR. BALESTRIERE: I would like, Ms. Kahn, if you
14 could put up Plaintiffs' Exhibit 1.

15 THE COURT: For the witness only?

16 MR. BALESTRIERE: I believe there has been no
17 objection to this, your Honor.

18 THE COURT: If you are moving its admission, go
19 ahead and move it.

20 MR. BALESTRIERE: Your Honor, I move Plaintiffs'
21 Exhibit 1 in for admission. It is going to be pages 1, 9,
22 10, and 20. I don't believe there is any objection to those
23 pages.

24 THE COURT: Any objection.

25 MR. GROVER: No, your Honor.

1 Q For years you traveled to New York and you had
2 consensual BDSM sex with Mr. Rubin, correct?

3 A That is correct, on certain occasions.

4 Q You traveled from Las Vegas to New York for the purpose
5 of having consensual BDSM sex with Mr. Rubin; is that
6 correct?

7 A That is correct.

8 Q You traveled from Chicago to New York for the purpose
9 of having consensual BDSM sexual encounters with Mr. Ruben
10 on numerous occasions, correct?

11 A That is correct.

12 Q And you traveled from Seattle to New York; and while in
13 New York, you had consensual BDSM sexual encounters with
14 Mr. Rubin, correct?

15 A On some occasions, yes.

16 Q Okay.

17 A Correct.

18 Q You made your own travel arrangements to do that,
19 correct?

20 A Yes, I did.

21 Q You booked your own flights, correct?

22 A Yes, I did.

23 Q You boarded airplanes to come to New York; is that
24 correct?

25 A Yes, that is correct.